

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

United States of America,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No.
	)	
Twenty Thousand, Three Hundred Fifteen	)	JURY TRIAL REQUESTED
Dollars and Eighty-Four Cents (\$20,315.84)	)	
in U.S. Currency, more or less, seized from	)	
Eric Frimpong,	)	
	)	
Defendant <i>in rem</i> .	)	
	)	

---

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM***

Plaintiff, United States of America, brings this Complaint under Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges:

**NATURE OF THE ACTION**

This is an action to forfeit and condemn to the use and benefit of the United States of America the following property: Twenty Thousand, Three Hundred Fifteen Dollars and Eighty-Four Cents (\$20,315.84) in U.S. Currency, more or less, seized from Eric Frimpong, for violations of 18 U.S.C. § 1343.

**JURISDICTION AND VENUE**

Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property under 18 U.S.C. § 981(a)(1)(C). This Court has subject matter jurisdiction over this action under 28 U.S.C. § 1345 and *in rem* jurisdiction under 28 U.S.C. § 1335(a).

Venue is proper in this district pursuant to 28 U.S.C. §§ 1335(b)(1)(A) and 1339.

**THE DEFENDANT IN REM**

The defendant *in rem* is: Twenty Thousand, Three Hundred Fifteen Dollars and Eighty-Four Cents (\$20,315.84) in U.S. Currency, more or less, seized from Eric Frimpong. The defendant *in rem* is presently in the custody of the United States Secret Service.

**FACTS**

1. In a romance scam, a criminal adopts a fictitious online identity to gain a victim's affection and trust. The criminal then uses the illusion of a romantic relationship to manipulate and steal from the victim. The criminal persuades the victim to send or deposit money to various bank accounts controlled by the criminal or his co-conspirators. The criminal often uses third-party bank accounts to conceal the nature, location, source, ownership, and control of the funds obtained from the victim.

2. In February of 2021, The United States Secret Service (USSS) identified R.T., a resident of New Hampshire, as a victim of a romance scam involving a "money mule" in the Grand Rapids, Michigan area. A money mule is a person who receives and moves money obtained from victims of fraud.

3. Special agents with the USSS interviewed R.T. She said that she had met "Allen Casale" on the dating website SilverSingles.com, and they started a relationship. Casale claimed his subscription to the service was ending and asked to move their discussion to text messages. R.T. has never met Casale. R.T. has spoken by telephone to Casale and said that he has a heavy foreign accent.

4. Casale claimed to work as an independent contractor in the field of satellite technology for an unknown government. Casale claimed that an experiment caused equipment to break, and he needed money for a replacement part. R.T. sent \$63,000 to Lake Michigan Credit Union account in the name of Unique Import & Export LLC for buying a replacement part.

Later, R.T. sent another \$12,000 wire transfer that Casale requested. Casale claimed he was sending R.T. gold for safe keeping and sent her video of the gold. R.T. did not receive anything from Casale.

5. On February 23, 2021, R.T. called the United States Secret Service (USSS) Grand Rapids Office, and said that she had deposited a check for \$31,000, more or less, to a TD Bank account in the name of NewKing 1730 Group LLC, as requested by Casale.

6. On February 23, 2021, a USSS special agent contacted TD Bank and told them that R.T. was involved in a romance scam, and she had deposited funds to an account in the name of NewKing 1730 Group LLC account #438-4584847.

7. Subpoenaed records from the NewKing 1730 Group LLC account #438-4584847 listed an address of 1730 Montgomery Avenue, Apt 5H, Bronx, NY 10453. Publicly available information showed that Eric Frimpong lives at that address.

8. Further review of the NewKing 1730 Group LLC account #438-4584847 bank records showed a deposit on February 17, 2021, of a cashier's check in the amount of \$31,293.65. The cashier's check was drawn on Bangor Bank and payable to R.T.

9. On March 11, 2022, USSS agents interviewed Eric Frimpong. Frimpong said he was employed in music, housekeeping, and shipping distribution. Frimpong said that the name of his business is King 1730 Group LLC. When asked about the services and products he sells, Frimpong said "If you want to send goods to Ghana, we can send it." Frimpong said he did not know R.T. and he denied doing business with her. Frimpong also denied knowing Alan Casale.

10. Because Frimpong admitted that he had no business relationship with R.T, he voluntarily signed an agreement, surrendering the funds remaining from R.T.'s \$31,293.65 deposit NewKing 1730 Group LLC's account. TD Bank provided a cashier's check made payable to the USSS and Eric Frimpong with the remaining balance of \$20,315.84, the defendant

*in rem.* USSS never recovered the rest of R.T.'s payment to Frimpong's business account.

**CLAIM FOR FORFEITURE**

11. The allegations contained in paragraphs 1 through 10 of this Verified Complaint for Forfeiture *in rem* are incorporated by reference.

12. Title 18, United States Code, Section 981(a)(1)(C), provides for the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting "specified unlawful activity" (as defined in 18 U.S.C. § 1956(c)(7)), or a conspiracy to commit such offense. Title 18, United States Code, Section 1343 (wire fraud) is "specified unlawful activity" pursuant to 18 U.S.C. §1956(c)(7).

13. The defendant *in rem* constitutes or is derived from proceeds traceable to wire fraud. As a result, the defendant *in rem* is liable to condemnation and forfeiture to the United States for its use in accordance with 18 U.S.C. § 981(a)(1)(C).

**PRAYERS FOR RELIEF**

Therefore, the United States requests that:

- (a) the Clerk of Court issue a Warrant of Arrest in Rem in the form submitted with this Verified Complaint to the United States Secret Service, or any authorized federal law enforcement officer for the District of New Hampshire, commanding him to arrest the defendant *in rem*;
- (b) this matter be scheduled for a jury trial;
- (c) judgment of forfeiture be entered; and
- (d) this Court grant the United States its costs and whatever other relief to which it may be entitled.

Respectfully Submitted,

JANE E. YOUNG  
United States Attorney

Dated: November 8, 2022

By: /s/ Robert J. Rabuck  
Robert J. Rabuck  
NH Bar # 2087  
Chief, Civil Division  
Assistant U.S. Attorney  
District of New Hampshire  
53 Pleasant Street  
Concord, New Hampshire  
603-225-1552  
[rob.rabuck@usdoj.gov](mailto:rob.rabuck@usdoj.gov)

**VERIFICATION**

I, Adam Terrizzi, being duly sworn, depose and say that I am a Special Agent assigned to the United States Secret Service, and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in rem* and know the contents therein, and that the same is true to the best of my knowledge, information, and belief.

The sources of my information and the grounds of my belief are official records and files of the United States and the State of New Hampshire, and information obtained by me and other law enforcement officers during an investigation of alleged violations of the wire fraud laws of the State of New Hampshire and of the United States.

/s/ Adam Terrizzi  
Adam Terrizzi

STATE OF NEW HAMPSHIRE  
COUNTY OF MERRIMACK

Subscribed and sworn to before me on November 8, 2022.

/s/ Francine D. Conrad  
Notary Public

My commission expires: March 27, 2024.